

PSJ3

Exhibit 448

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

- - -

4 IN RE: NATIONAL : HON. DAN A. POLSTER
5 PRESCRIPTION OPIATE :
6 LITIGATION :
7 :
8 APPLIES TO ALL CASES : NO.
9 :
10 : 1:17-MD-2804

11 - HIGHLY CONFIDENTIAL -
12 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

- - -

January 9, 2019

- - -

13 Videotaped sworn deposition of
14 RITA NORTON, taken pursuant to notice,
15 was held at REED SMITH LLP, Three Logan
16 Square, 1717 Arch Street, Suite 3100,
17 Philadelphia, Pennsylvania, beginning at
18 9:44 a.m., on the above date, before
19 Margaret M. Reihl, a Registered
20 Professional Reporter, Certified
21 Shorthand Reporter, Certified Realtime
22 Reporter, and Notary Public.

- - -

23 GOLKOW LITIGATION SERVICES
24 877.370.3377 ph | 917.591.5672 fax
 deps@golkow.com

1 coordinate efforts?

2 A. No.

3 Q. Never?

4 A. I don't know.

5 Q. We talked earlier -- we were
6 talking earlier about membership in the HDA, and
7 we just covered manufacturers.

8 Do you know if other distributors
9 are members of the HDA?

10 A. Yes.

11 Q. Which manu -- or which
12 distributors do you understand to be members of
13 the HDA?

14 A. So they're referred to as primary
15 distributors or the distributors who purchase
16 from manufacturers directly. I believe there's
17 38 total or something around 35 to 38.

18 Q. Is AmerisourceBergen a primary
19 distributor?

20 A. Yes.

21 Q. Okay. How about McKesson?

22 A. Yes.

23 Q. Cardinal Health?

24 A. Yes.

1 Q. H.D. Smith?

2 A. Yes.

3 Q. Henry Schein?

4 A. Yes.

5 Q. Can you think of any other
6 distributors that are primary distributors?

7 A. Smith Drug and...

8 Q. Do you know if McKesson holds a
9 board position or a position on the Executive
10 Committee of the HDA?

11 A. Yes.

12 Q. Do you know how long that
13 McKesson has held the board position or
14 Executive Committee position with the HDA?

15 A. Since before 2004.

16 Q. How about Cardinal Health, do you
17 know if --

18 A. Yes.

19 Q. I'm sorry. Let me ask the
20 question, so we know what you're agreeing to
21 first.

22 Do you know if Cardinal Health
23 has held board positions or Executive Committee
24 positions at the HDA?